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14		DISTRICT COLIDT
15	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
16	DISTRICT	JF NEVADA
17	NEW HORIZON HOME CARE, LLC, and GUIDING LIGHT HOSPICE, INC.,	Case No: 3:19-cv-00521-RCJ-WGC
18	Plaintiffs,	
19	-VS-	ORDER GRANTING STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT
20	NORTHEASTERN NEVADA REGIONAL HOSPITAL, HORIZON HOSPICE, INC.,	[FIRST REQUEST]
21	GENESIS HOSPICE, LLC, GENESIS	
22	HOME HEALTH SERVICES, INC.,	
~~ '	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS	
23	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS SPENCER, QUERUBIN IGUBAN, JR., M.D., DEBRA ANDERSON,	
24	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS SPENCER, QUERUBIN IGUBAN, JR.,	
24 25	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS SPENCER, QUERUBIN IGUBAN, JR., M.D., DEBRA ANDERSON, MARISSELLA (CHELLA) ELLIOT,	
24 25 26	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS SPENCER, QUERUBIN IGUBAN, JR., M.D., DEBRA ANDERSON, MARISSELLA (CHELLA) ELLIOT, ALICE ALLEN,	
24 25	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS SPENCER, QUERUBIN IGUBAN, JR., M.D., DEBRA ANDERSON, MARISSELLA (CHELLA) ELLIOT, ALICE ALLEN,	

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Defendants DEBBIE ANDERSON, ALICE ALLEN and MARISSELLA ELLIOT (collectively referred to herein as the "New Defendants"), by and through their counsel, pursuant to FRCP 6(b)(1)(A) and LR IA 6-1, respectfully request this Court for an extension of time to respond to Plaintiffs' complaint in the above-entitled matter for the following reasons:

- 1. Several Defendants have moved to dismiss the complaint. *See, e.g.*, ECF Nos. 28 (Defendant Horizon Hospice), 46 (Defendant Northeastern Nevada Regional Hospital), 60 (Defendant Genesis Home Health Services), 85 (Defendant Highland Manor), and 99 (Defendant Genesis Hospice).
- 2. The New Defendants submit that many of the arguments set forth in the abovementioned motions are applicable to them, and that they may also possess additional, unique arguments to be dismissed from this action.
- 3. In the interest of party and judicial economy, and to avoid the briefing of yet another motion to dismiss at this juncture, the New Defendants suggested to counsel for Plaintiffs that their deadline to respond to the complaint be stayed until after the Court has ruled on the above-mentioned motions.
- 4. Plaintiffs agree to, and do not oppose, the relief requested in this stipulation and request for extension of time.
- 5. Consequently, Defendants DEBBIE ANDERSON, ALICE ALLEN, and MARISSELLA ELLIOT respectfully submit that they should be given until 15 days after a ruling on Defendant Northeastern Nevada Regional Hospital's motion to dismiss (ECF No. 85) to respond to the complaint.

1	6. In consideration of the above,	good cause exists for the parties' requested
2	extension and it is not for purposes of delay.	
3	DATED: February 3, 2020	Respectfully submitted,
4		
5	By: <u>/s/ Stephen S. Kent</u> STEPHEN S. KENT	By: /s/Arthur A. Zorio Arthur A. Zorio
6	Nevada Bar No. 1251 KENT LAW	BROWNSTEIN HYATT FARBER
7	201 West Liberty Street, Suite 320 Reno, NV 89501	SCHRECK, LLP 5371 Kietzke Lane
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10	Joseph Carlos Alamilla Admitted Pro Hac Vice	PHILLIP F. CRAMER
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12	Sandy, UT 84070 Telephone: (801) 232-2666	Admitted Pro Hac Vice
13	Email: joseph@jcalegalsolutions.com	SHERRARD ROE VOIGT & HARBISON, PLC
14	Counsel for Plaintiffs New Horizon Home Care, LLC and Guiding Light Hospice, Inc.	150 3 rd Avenue South, Ste. 1100 Nashville, TN 37201
15	Cure, ELC una Guiang Light Hospice, Inc.	Telephone: (615) 742-4200 Email: PCramer@srvhlaw.com
16		RHolt@srvhlaw.com
17		Attorneys for Defendants Debbie Anderson and Alice Allen
18		
19		IT IS SO ORDERED:
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21		UNITED STATES DISTRICT JUDGE
22		DATED: February 4, 2020
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